

**Exhibit B**



## United States Department of Justice

### United States Attorney's Office Central District of California

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1400 United States Courthouse  
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October 28, 2024

#### **VIA USAfx**

#### **SEE ATTACHED SERVICE LIST**

Re: United States v. Michael Lerma, et al.  
CR No. 18-00172(A)-GW

Dear Counsel:

Pursuant to your request for discovery and the Protective Order in this matter, you will receive an email invitation from the government's secure electronic file sharing system, called USAfx, to access the government's discovery production. Please ensure that you download the materials within sixty (60) days, as the contents will automatically delete after that time. The contents of the production are listed below:

#### **SUBJECT TO PROTECTIVE ORDER:**

- LS\_010287-10361 (ML Incidents)
- LS\_010362-10363 (BOP Debrief Request/CHS Report)
- LS\_010364-10365 (Audio)
- LS\_010366-10845 (ML Documents)

The government will make available for your inspection any item of evidence referred to above, as well as any other evidence seized from your client and/or which the government intends to offer in its case-in-chief. Please contact me to arrange a mutually convenient time for your inspection of such items.

The government will produce to you any additional Jencks material—including any relevant grand jury transcripts, assuming a Rule 6(e) order has been issued—one week before trial if you agree to the production of reciprocal Jencks material at that time or affirmatively represent that you have no Jencks material to produce. Please inform me whether such an arrangement is acceptable to you.

Multiple Counsel

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The government also hereby gives notice that it may seek to introduce the other crimes, wrongs, or acts committed by your client that are referenced in the enclosed items pursuant to Rules 404(b) and/or 609(b) of the Federal Rules of Evidence. The government will provide a more detailed discussion of the Rule 404(b) evidence at a later date. This notice does not waive or relinquish the government's right to introduce the evidence described herein under any other applicable rule or principle of law.

The enclosed materials and any future discovery provided to you that may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law are provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

With this letter the government requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government also requests notice of any intention of your client to rely on an entrapment defense, or a defense involving mental condition or duress, and/or an alibi defense. Pursuant to Federal Rule of Criminal Procedure 12.1, the dates, times, and places of the charged offenses are detailed within the documents included within the discovery. Please contact me immediately if you believe that this notice is insufficient.

Please let me know if you have any questions or would like to further discuss any of the matters raised above.

Sincerely,

/s/

SHAWN J. NELSON

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Assistant United States Attorneys

International Narcotics, Money Laundering & Racketeering Section

**U.S. v. Michael Lerma, et al.**  
**CR 18-172(A)-GW**

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